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May 16, 2023

**Via ECF**

Honorable Mary K. Vyskocil  
United States District Judge  
United State District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

This request is GRANTED. The sentencing will take place on June 30, 2023 at 11:00 a.m. Having previously adjourned the sentencing twice at the request of defense counsel, the Court warned that it would not adjourn the sentencing again. Nevertheless, defense counsel submitted this request for yet another adjournment, days after the deadline to file his sentencing submission had already passed, without acknowledging the Court's prior warning, and citing the exact same reason he gave for requesting the previous adjournment. Defense counsel must prioritize this case. The Court will not adjourn the sentencing again.

Re: United States of America v. Cesar Cruz  
Case No.: 21-CR-00504(MKV)

Date: 5/16/2023  
New York, New York

*Mary Kay Vyskocil*  
Mary Kay Vyskocil  
United States District Judge

Your Honor:

This office represents Cesar Cruz, the Defendant in the above referenced matter which is currently on the Court's calendar for sentencing on May 26, 2023. **We write to request a final short adjournment of sentencing for approximately 28 days – until June 21, 23 or 26, 2023, or a date and time thereabouts convenient for the Court** – so that we can review the final sentencing memorandum with the client and his family. We intend to do both in the coming two weeks, as both professional and personal commitments have burdened our time. In order to review our sentencing submission with the client and to finish our submission and arrange a date upon which my client's family and friends can be in attendance, and to comply the Court's scheduling rules, we require the requested adjournment.

AUSA Kaylan Lasky and AUSA Kedar Bhatia have been advised of this request. The Court's consideration of this request is respectfully appreciated. Thank you.

Yours truly,

*John Russo*

John L. Russo (JR6200)

Cc: AUSA Kaylan Lasky (Via E-mail)  
AUSA Kedar Bhatia (Via E-Mail)